

THE CASSAR LAW FIRM, P.C.

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X Docket No.:

JAE GOTTLIEB,

Plaintiff,

COMPLAINT

-against-

MIRAC BAYRAM, aka "FLOP," and aka  
"MISS FLOP,"

Defendant.

-----X

The Plaintiff, JAE GOTTLIEB, through her attorneys, THE CASSAR LAW FIRM, P.C., as and for her Complaint against Defendant respectfully allege as follows:

**I.  
INTRODUCTION**

1. This is an action for damages against the Defendant who published a false and untrue publications on social media platforms and who committed cyberstalking, doxxing, harassment, slander, defamation, libel, published revenge porn and committed swatting of the Plaintiff. The Defendant publications about the

Plaintiff were untrue and false statements and the Defendant knew that the publications about the Plaintiff were untrue and false statements.

2. Defendant caused the false and defamatory Articles and Internet Articles to be published with knowledge of its falsity of and/or with a reckless disregard for its truth or falsity. Alternatively, the Defendants acted with negligent disregard for the truth.

3. As a result, Plaintiff have suffered and continue to suffer harm, including but not limited to, damage to her reputation, fear of physical injuries, severe emotional distress, death threats and embarrassment and humiliation for which she is entitled to recover damages.

## **II. PARTIES**

4. At all times pertinent to the allegations of this Complaint, the Plaintiff, Jae Gottlieb, is a citizen of the United States, resident of the State of New York and New York County.

5. The Defendant, MIRAC BAYRAM aka “FLOP” is not a citizen of the United States.

### **III. JURISDICTION AND VENUE**

6. This Court has subject-matter jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) based on complete diversity of citizenship between the Plaintiff and the Defendant and the amount of the conflict is over \$75,000.

7. Venue is proper in this District under 28 U.S.C. §1391(a) because a substantial part of the events or omissions giving rise to the claims occurred in this District, and Defendant are subject to personal jurisdiction in this District at the time this action is commenced.

### **IV. FACTS AND CIRCUMSTANCES**

8. The Defendant, Mirac Bayram, also known as “Miss Flop,” began his online terror towards the Plaintiff, Jae Gottlieb.

9. The Defendant, Mirac Bayram, has a huge plethora of pseudonyms and usernames across all social platforms, snapchat, instagram, and tiktok. Many of the accounts associated with these usernames have been banned and or deleted.

10. The Defendant, Mirac Bayram, makes new accounts regularly and has many instagram usernames are as such, “missflopsgentina,” “mikeyRey,” “missfloggentina,” “missfloggentinas,” “miss.floggentina,” “Princessfloggentina,” and “missfloggentinas.”

11. The Defendant, Mirac Bayram, Twitter usernames are as follows, “lanadelweight,” “LadyWhipperDown,” and “Missflopgentina.” The last username “Missflopgentina” being the Twitter account he currently uses.

13. The Defendant, Mirac Bayram, has many Tiktok usernames and or is currently using, are “rey\_nstalgia,” “rey\_nostlgia,” “Miss.flopsgentina,” “missflop.x,” “Missflopgentina\_,” “missflopschode,” and “mikey.rey3.” The “mikey.rey3” being the Tiktok he currently uses.

14. The Defendant, Mirac Bayram, also has a plethora of Reddit accounts as well, such as “ApprehensiveBus7578,” “DoggoWoggo3,” and “No\_Pause\_1093.” The latest Reddit account the Defendant, Mirac Bayram, has been using is “ApprehensiveBus7578.”

15. The Reddit community, “r/jaegottliebSNARK,” has made posts along with 54.3k messages in the community “lounge,” where the users talk amongst themselves. The other aliases that the Defendant, Mirac Bayram, has used are “Princess Del Rey,” “Lady Whipper Down,” “Mikey Rey,” “Mike Rey,” “Rey Nstalgia,” “Alayna Kitty,” “Alayna K\*tty,” “Josie,” “Josie Richards,” and “ReyRey.” The current pseudonym the Defendant, Mirac Bayram, uses is Mikey Rey.

16. The Defendant, Mirac Bayram, snapchat username is “mikewazzaaa.” The Defendant, Mirac Bayram, also has, and or had, a discord server called the

“JayJaysPalace” where the Defendant, Mirac Bayram, posted videos of gore, and CP/CSAM.

17. The Defendant, Mirac Bayram, started his reign of terror by commenting on The Plaintiff’s Tiktok live streams saying “like I will find Jae,” and “girl she can’t hide from me.” The Defendant, Mirac Bayram, also posting to his Tiktok videos that were an attempt to doxx the plaintiff’s home address, which the home address was incorrect at this time, “I feel like its 304 Avenue but the fact that I followed [the plaintiff] around last night babe I’ve been surveilling u 24/7...” In that same Tiktok post, the Defendant, Mirac Bayram, included photos of the building he thought was the Plaintiff’s apartment building and tagged the building’s address in it as well.

18. On or about May 17, 2023, the Defendant, Mirac Bayram, started “live streaming” on Instagram. During this live stream, he showed his phone screen scrolling through his photo roll, showing what appeared to be CP/CSAM as well as a video of a bunch of dead children hanging from nooses in a house that he later sent to the Plaintiff.

19. On or about May 17, 2023, the Defendant, Mirac Bayram, also used racial slurs, claimed he was Korean, that he was from Korea, that he is from California, that he isn’t Muslim or Turkish, all being the start of all of the lies he would make about himself.

20. On or about May 17, 2023, the Defendant, Mirac Bayram, called the Plaintiff transphobic slurs, said that his private investigator tried to attack Jae, and that he wanted to send a hitman and an assassin after Jae, all while misgendering the Plaintiff.

21. On or about May 17, 2023, on that same Instagram live stream, the Defendant, Mirac Bayram, is observed scrolling through a hitman website, claiming that he hired a hitman that he paid with PayPal and included a photo of the Plaintiff and the “304 Avenue” which he believed was the Plaintiff’s home address.

22. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, claims to have spent his tuition money in an amount of \$20,000.00 to hire a hitman. The Defendant, Mirac Bayram, states that he “will never let this go.”

23. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that “I really want to make her life suffer, she’s pretty, but I want to make her life suffer.”

24. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that “I’m going to fucking kill Jae, I’m going to fucking kill the Plaintiff.”

25. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that “I’m going to fucking slit her throat.”

26. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that “Don’t you guys just want to be [the Plaintiff]; I want to fucking skin [the Plaintiff] and rip his fucking face off and put it on mine. Like I want that fucking botox.”

27. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that “I will fucking going over to the Plaintiff’s apartment, in her fucking stinking marble palace, and I will beat her ass.”

28. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that “Oh my god, there’s my knife... Should I stab [the Plaintiff] with this? I think I’m going to stab her. I think I’m going to stab [the Plaintiff] with this.”

29. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that “I’m going to fly to New York and I’m going to fucking kill [the Plaintiff], I’m going to slit her fucking eye balls, I’m going to choke that bitch.”

30. On or about May 17, 2023, on a public platform, the Defendant, Mirac Bayram, states that he wanted to go live with [the Plaintiff]. He showed a “fleshlight”, a personal masturbator sex toy, and said “I want to suck her [the

Plaintiff's] pussy" then showed his dildo. He then shoved the dildo in the fleshlight and said "This is what I'm going to do to [the Plaintiff], I'm going to rape him."

31. On or about May 18, 2023, the Defendant, Mirac Bayram, went live on Instagram again where he further threatened the Plaintiff and showed his phone screen with the Plaintiff on Tiktok live where he had a knife and was stabbing his phone screen where the Plaintiff's face was and was saying "Like I want to fucking kill her."

32. On or about May 18, 2023, the Defendant, Mirac Bayram, states that "I'm going to find [the Plaintiff] and I'm going to fucking put a bullet into her fucking wig. I'm going to kill [the Plaintiff]; I'm going to chop her into pieces. I'm going to hide in her apartment and I'm going to kill her slowly while she bleeds to death, screaming. She's going to beg for me to not kill her."

33. On or about May 18, 2023, on a public platform, the Defendant, Mirac Bayram, tried finding the nail salon that the Plaintiff attends, which months later he eventually found and called.

34. On or about May 19, 2023, the Defendant, Mirac Bayram, states that he went live on Instagram yet again, this time saying, "I could just, I really can't like wait to throw like acid in face of [the Plaintiff], I might like throw acid in her face."



35. On or about May 19th, 2023, the Defendant, Mirac Bayram, on a public platform, stated while live on Instagram “I am going to throw acid in her face though,” “I’m going to do an acid attack.”

36. On or about May 19, 2023, continuing to live stream on instagram every day on a public platform, the Defendant, Mirac Bayram, would falsely claim that he is doing all of this because the Plaintiff was “blackmailing him for a universe” which is a Tiktok live gift. A Tiktok gift is one of two ways you can pay Tiktok live streamers, the other way being subscribing.

37. On or about August 5, 2023, the Defendant, Mirac Bayram, posted a screen recording of him scrolling through his list CP/CSAM videos, showing all of the thumbnails, to his Instagram story that a lot of the Plaintiff’s viewers and even the Reddit people sadly saw and had to report to the FBI.

38. On or about May 15th, 2023, the Plaintiff filed the initial FBI report in connection with conduct of the Defendant, Mirac Bayram.

39. On or about May 15th, 2023, around that time of the Defendant, Mirac Bayram, posting the CP/CSAM to his Instagram story, the Defendant, Mirac Bayram directly sent the Plaintiff, as well as others, CP/CSAM. As a result of this, on or about August 10, 2023, the Plaintiff went to the FBI in person to have them retrieve the CP/CSAM off of her phones. The FBI told the Plaintiff that those videos were videos they have seen before as they have been circulated online for

years. The Plaintiff has made reports multiple times to the FBI since the initial FBI report against the Defendant, Mirac Bayram.

40. While the Defendant, Mirac Bayram, instagram live streams, Instagram posts, Instagram stories, Plaintiff's social media viewers, Tiktok subscribers, were helping the Plaintiff find the identity of the Defendant and what country he lived in and any other information of the Defendant, Mirac Bayram, so that the Plaintiff could report him to the authorizes for all the death threats, harassment, and doxxing of phone number of the Plaintiff and attempts to dox the phone number of the Plaintiff.

41. On a public platform, the Defendant, Mirac Bayram, showed the outside from his window, and from that post the Plaintiff was able to determine the home address of the Defendant, Mirac Bayram. The Defendant, Mirac Bayram, lives in a college dorm/apartment in Amsterdam, Nedersticht 282, 1083 XG, Amsterdam, Netherlands.

42. After all of the live streams, stalking, harassing, doxxing Jae, the Defendant, Mirac Bayram, continued to create empty Tiktok accounts and would comment the Plaintiff's phone number, the Plaintiff's home address, and private information on the Plaintiff's parents in her chat.

43. In or about September 2023, the Defendant, Mirac Bayram, started posting screen recordings of the Plaintiff's Tiktok live streams and Instagram live streams of the Plaintiff.

44. In or about September 2023, the Defendant, Mirac Bayram, posted videos which include her talking about how the Plaintiff's obtained her apartment, a very personal clip of the Plaintiff telling her SA story, and other videos that personally attacking the Plaintiff.

45. The Plaintiff has reported and requested to each social media platform that very video and Youtube be removed; however, nothing has been removed from the social media platforms.

46. In 2023, the Defendant, Mirac Bayram, has also doxxed the Plaintiff multiple times. On or about June 5, 2023, the Defendant, Mirac Bayram, posted in the Plaintiff's chat what he believed at that time to be the Plaintiff's home address "[The Plaintiff] Lives @ 20 Broad St."

47. On November 23, 2023, the Defendant, Mirac Bayram, posted to both his Instagram and Tiktok "Me flying from Amsterdam to 40 Broad Street 12D on the 12th floor."

48. On November 24 2023, the Defendant, Mirac Bayram, posted to his Instagram and Tiktok a video saying, "The NYPD After walking up to 40 Broad Street Apt 12D on the 12<sup>th</sup> floor where jaegottlieb lives for the 818352253th time."

49. In 2023, the Defendant, Mirac Bayram, has also edited fake screenshots of the Plaintiff saying vulgar things on tweets, such as “Ngl Cameron Boyce as a kid was kind of hot. But he’s rotting now anyways lol.”

50. In 2023, the Defendant, Mirac Bayram, has also edited fake screenshots of the Plaintiff saying vulgar things “If I ever had to birth out a kid like a real woman, I’d rape it after it comes out.” These tweets are edited and faked.

51. In 2023, the Defendant, Mirac Bayram, has also edited fake screenshots of the Plaintiff saying vulgar things “Why do children make me horny like should I collab with the children in Gaza LOL #Freeisrael.” These tweets are edited and faked.

52. On or about November 18th, 2023, someone on the Reddit said, “What if the Plaintiff groomed mikey rey and that’s why he did all of this?” On or about November 20, 2023, the Defendant, Mirac Bayram, created and uploaded a fabricated story time about “[The Plaintiff] grooming him.” The Snark Reddit page gave him that idea and he took it and ran with it. The Plaintiff did not groom him. Here is the link to Flop’s Youtube video:

<https://www.youtube.com/watch?v=NyD6xf8m7T4>

53. On or about November 20, 2023, the Defendant, Mirac Bayram, used an actual victim’s story in his fabricated story time video by the name Adam McIntyre. The Defendant, Mirac Bayram, copied the style of the video, the videos

even look similar, and the stories sound similar. Here is the link to Adam McIntyre's Youtube video about Colleen Ballinger which the Defendant, Mirac Bayram, copied about the Plaintiff:

[https://www.youtube.com/watch?v=969KK\\_Kj38A&list=PL7XA10w7Cmr70wZR4B4dL-R0WtzuLsfnx](https://www.youtube.com/watch?v=969KK_Kj38A&list=PL7XA10w7Cmr70wZR4B4dL-R0WtzuLsfnx)

54. The Defendant, Mirac Bayram, has also sent revenge porn to the Plaintiff's mother and father. On or about August 8, 2023, the Defendant, Mirac Bayram, sent the Plaintiff's father a photo of the Plaintiff in a sexual act then posted the screenshot of the messages to the "r/jaegottliebSNARK" Reddit page.

55. On or about November 19, 2023, the Defendant, Mirac Bayram, posted a screenshot of another message the Defendant, Mirac Bayram, sent to the Plaintiff's father and Plaintiff's mother in which the Plaintiff is depicted in a sexual act to his Instagram story.

56. On or about November 26, 2023, the Defendant, Mirac Bayram, included a Zillow listing link of the Plaintiff's apartment building to the Instagram bio of the Defendant, Mirac Bayram, and posted it to the "r/MissFlopSNARK" page moderated and created by the same moderator of the "r/jaegottliebSNARK" Reddit page "NeuroSciencee."

57. In November 2023, a woman, by the name Leslie/Toni, contacted the Defendant, Mirac Bayram, on the Plaintiff's behalf to talk to him about coming

to a resolution for him to stop terrorizing the Plaintiff as the FBI was not taking action to catch the Defendant, Mirac Bayram. But this pause did not last long and the Defendant, Mirac Bayram, went back to his ways and continued to terrorize the Plaintiff.

58. On or about April 22, 2023, the Defendant, Mirac Bayram, things started, a Reddit user “NeuroSciencee” created the r/jaegottliebSNARK page. That is the page that has hated, harassed, libeled, defamed and cyberstalked the Plaintiff for several months. People on that Reddit community have made numerous posts and over 54.3k messages in the “lounge.”

59. Upon information and belief commencing November 21, 2023, through November 24, 2023, the Plaintiff was swatted by the Defendant, Mirac Bayram, who has called the NYPD, EMS, and the fire department on the Plaintiff.

60. Upon information and belief commencing November 21, 2023, through November 24, 2023, the Defendant, Mirac Bayram, called to harass, intimidate, scare, and cause the Plaintiff harm. The police described whoever was calling over and over on the Plaintiff, was a “chronic caller.” All of the swat calls started just days after Stasia doxxed the Plaintiff by putting a screenshot of the Plaintiff’s home address onto the “r/jaegottliebSNARK” Reddit “lounge.”

61. Upon information and belief, on or about November 19, 2023, and one day after “Jessie” doxxed the Plaintiff by posting a Tiktok that disclosed the

Plaintiff home address, a false report call was made to the CPS by the Defendant, Mirac Bayram.

62. On or about November 22, 2023, at approximately 4:30 pm, a CPS worker, Ms. Howard, came to the apartment building of the Plaintiff and spoke to the Plaintiff's doorman at building's front desk. Ms. Howard requested to go to the Plaintiff's apartment to speak with the Plaintiff. The Plaintiff was not home at the time, as she was Tiktok live streaming herself walking to the NYPD precinct to ask if there was anything to do about the swat calls. The police told the Plaintiff there was nothing they or her could do about the swat calls.

63. The Plaintiff's doorman called the Plaintiff as she was walking to the precinct, and he told the Plaintiff that Ms. Howard was there and was wanting to come to her apartment and speak with the Plaintiff. The Plaintiff did not understand what was going on as the Plaintiff does not have any children and is almost never around children. The Plaintiff's doorman then gave the phone to the CPS worker, Ms. Howard, who had a discussion with the Plaintiff.

64. After this phone call, the Plaintiff talked with the NYPD then walked home. When the Plaintiff got home, she met with Ms. Howard and her father at her building and discussed what the contents of the false report which includes allegation that the Plaintiff "abused a six year old in her apartment." Ms. Howard indicted that CPS would be conducting a sixty-day investigation. After the

discussion, Ms. Howard accompanied the Plaintiff and her father to the Plaintiff's apartment and Ms. Howard did a thorough search of the apartment.

65. On or about November 14, 2023, "Jessie" started a conversation on the Reddit "lounge" by posting a Dropbox link including screenshots of comments left on a post of Jeramy Bagby, who is Kade's friend (the Plaintiff's ex-friend), threatening and lying about the Plaintiff by the Plaintiff's best friend, who passed away, ex-boyfriend saying "Everything you say is the damn truth. Dude that animal was half the reason my beautiful girlfriend was all fucked up and passed away three months ago. People and you're right karma deserves to get that thing. Somehow my beautiful girlfriend is dead and that thing gets to fucking shit and lie on other. I'll back up 1000% everything you're saying and she needs or he needs whatever it is to be in jail and judge by the law and everything it's doing to p. Hit me up bro seriously. Dude hit me up that animal deserves to be in jail. That thing is a fucking disgusting piece of shit a lowlife and deserves what's coming to it."

66. On or about November 18, 2023, and November 21, 2023, After the people of the Plaintiff's snark Reddit, including Jessie and Stasia, heard about the CPS investigation, they started speculating, libeling, and defaming the Plaintiff by claiming that the call was about the Plaintiff "grooming" the Defendant. Which of course is not true. They then started falsely claiming, speculating, libeling, and defaming the Plaintiff by saying that her iMac, that the screen of had been broken



for months prior to this, had CP on it and that was the reason she had been stomping on it on her Tiktok live streams days prior to the CPS investigation.

**V.  
THE PLAINTIFF, JAE GOTTLIEB, SUFFERS  
REPUTATIONAL AND OTHER HARM**

67. The Defendant, Mirac Bayram's, false and insulting statements about the Plaintiff, Jae Gottlieb, were defamation *per se*. They tended to and did damage the Plaintiff, Jae Gottlieb, in her trade, occupation, and/or business, and they were defamatory on their face without reference to any extrinsic information.

68. The Plaintiff, Jae Gottlieb, has suffered harm as a direct result of the Defendant, Mirac Bayram's, false, defamatory statements.

69. These defamatory statements have caused the Plaintiff, Jae Gottlieb, emotional pain and suffering at the hands of the Defendant, as well as injury to her reputation, honor, and dignity.

70. The Plaintiff, Jae Gottlieb, has suffered professional harm as a direct result of the Defendant, Mirac Bayram's, defamatory statements. The Plaintiff, Jae Gottlieb's professional success is inextricably bound up with her social public platform, where viewers look to her for wisdom, wit, honesty, integrity, and courage. By attacking The Plaintiff, Jae Gottlieb, the Defendant has injured the reputation on which she makes her livelihood and attracts viewers.

71. The Defendant, Mirac Bayram's, defamatory statements caused the Plaintiff, Jae Gottlieb, to lose the support and goodwill of many of her viewers.

72. The Plaintiff, Jae Gottlieb, is a social media advisor and influencer whose reputation is the very lifeblood of her trade, and the Defendant, Mirac Bayram's, defamatory statements have therefore inflicted wide-ranging and substantial harm.

73. The Plaintiff, Jae Gottlieb, filed this lawsuit to obtain redress for those injuries.

**VI.  
CAUSE OF ACTION:  
DEFAMATION**

74. Plaintiff, Jae Gottlieb, incorporates by reference all preceding paragraphs and re-alleges them as if set forth fully herein.

75. The Defendant, Mirac Bayram, published statements to the public as outline and identified in all preceding paragraphs were false.

76. Each of those statements contained numerous falsehoods about the Plaintiff, Jae Gottlieb, whether on their face and/or by virtue of a clear implication affirmatively intended by the Defendant, Mirac Bayram.

77. The Defendant, Mirac Bayram's, false statements regarding the Plaintiff, Jae Gottlieb, were defamatory *per se*.

78. The Defendant, Mirac Bayram's, false and defamatory statements were published throughout New York State and around the world on social public, and elsewhere on the internet. The Defendant, Mirac Bayram, ensured that his false and defamatory statements about the Plaintiff, Jae Gottlieb, would receive a wide circulation by making them on social public, and elsewhere on the internet.

79. The Defendant, Mirac Bayram, made these false and defamatory statements knowing that they were false or with reckless disregard for their truth or falsity.

80. The Defendant, Mirac Bayram, made these false statements with ill will and spite, and with wanton, reckless, or willful disregard for their injurious effects on the Plaintiff, Jae Gottlieb, and the Plaintiff's rights.

81. The Defendant, Mirac Bayram's, false and defamatory statements caused the Plaintiff, Jae Gottlieb, to suffer reputational, emotional, and professional harm, as alleged above.

## **VII. PRAYER FOR RELIEF**

WHEREFORE, the Plaintiff, Jae Gottlieb, prays for relief as follows:

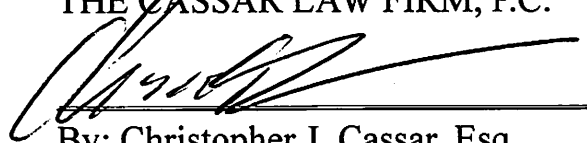
- (i). Ordering the Defendant, Mirac Bayram, to retract any and all defamatory statements;
- (ii). Ordering the Defendant, Mirac Bayram, to pay compensatory damages in an amount to be determined at trial;

(iii). Ordering the Defendant, Mirac Bayram, to pay punitive damages in an amount to be determined at trial; and

(iv). Awarding pre- and post-judgment interest, costs, and such other and further relief as this Court may deem just and proper.

Dated: New York, New York  
February 21, 2024

Yours, etc.,  
THE CASSAR LAW FIRM, P.C.

A handwritten signature in black ink, appearing to read 'Cassar', is written over a horizontal line.

By: Christopher J. Cassar, Esq.  
Attorneys for the Plaintiff  
13 East Carver Street  
Huntington, New York 11743  
(631) 271-6596  
cjcassar@cassarlaw.com  
Cassar File No:

## CERTIFICATION

STATE OF NEW YORK )

SS.:

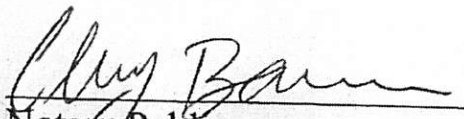
COUNTY OF NEW YORK)

JAE GOTTLIEB, being duly sworn, deposes and says:

I am the Plaintiff in the within action; I have read the forgoing Complaint and know the contents thereof; and the same is true to my own knowledge, except as to the matters therein stated to be alleged on information and belief, and as to the matters therein stated to be alleged on information and belief, and as to those matters, I believe it to be true.

  
JAE GOTTLIEB

Sworn to before me on this  
27th day of February 2024.

  
Notary Public

Clemmy Bowen  
Commissioner of Deeds, City of New York  
No. 2-14535  
Cert. Filed in New York County  
Commission Expires Nov 1, 2025  
The UPS Store 82 Nassau St NY, NY 10038  
212.406.9010